IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

ETHICON WAVE 6 CASES LISTED IN EXHIBIT A TO PLAINTIFFS' NOTICE OF ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF SHELBY THAMES FOR WAVE 6

Plaintiffs filed a Notice of Adoption [Dkt. 4852] in the Wave 6 cases identified in Exhibit A to their Notice adopting their Motion to Exclude the Opinions and Testimony of Shelby Thames and Supporting Memorandum from Ethicon Wave 1 Dkt. #2039, Wave 2 Dkt. #2455 and Wave 3 Dkt. #2839. Defendants hereby adopt and incorporate by reference their *Daubert* responses filed in relation to Shelby Thames in Ethicon Wave 1, Dkt. #2187, Wave 2, Dkt. #2553 and Wave 3 Dkt. #2957. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in Waves 1, 2 and 3 response briefings.

Dated: November 6, 2017

Respectfully submitted,

/s/ David B. Thomas

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COUNSEL FOR DEFENDANTS ETHICON, INC. AND JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2017, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

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